

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

GREENBERG TRAURIG, LLP

Alan J. Brody, Esq.
500 Campus Drive, Suite 400
Florham Park, New Jersey 07932
(973) 443-3543 (Telephone)
(973) 295-1333 (Facsimile)

Co-counsel to the Ad Hoc Group

In re:

WEWORK INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-19865 (JKS)

(Joint Administration Requested)

APPLICATION FOR THE *PRO HAC VICE*
ADMISSION OF ELI J. VONNEGUT, ESQ.

The Ad Hoc Group (as defined in the First Day Declaration) by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes this application (the “**Application**”), for *pro hac vice* admission of Eli J. Vonnegut, Esq., and represents as follows:

1. On November 6, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Mr. Vonnegut is a partner of the firm of Davis Polk & Wardwell LLP, which maintains offices at, among other places, 450 Lexington Avenue, New York, NY 10017.

¹ A complete list of each of the Debtors in these chapter 11 cases is attached hereto as Exhibit A-1, and may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/WeWork>. The location of Debtor WeWork Inc.’s principal place of business is 12 East 49th Street, 3rd Floor, New York, NY 10017, and the Debtors’ service address in these chapter 11 cases is WeWork Inc. c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005.

Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, the Ad Hoc Group requests that Mr. Vonnegut be allowed to appear *pro hac vice* for the purposes of representing the Ad Hoc Group in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of Eli J. Vonnegut, Esq., Mr. Vonnegut is a member in good standing of the bars of the State of New York, the United States Court of Appeals for the Second Circuit, and the United States District Court for the Southern District of New York. Mr. Vonnegut is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Vonnegut has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Vonnegut also has represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Eli J. Vonnegut, Esq. *pro hac vice* in the above-captioned matter.

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Dated: November 7, 2023

Respectfully submitted,

/s/ Alan J. Brody

Alan J. Brody, Esq.

GREENBERG TRAURIG, LLP

500 Campus Drive, Suite 400

Florham Park, New Jersey 07932

Telephone: (973) 443-3543

Facsimile: (973) 296-1333

Email: brody@gtlaw.com

Co-counsel to the Ad Hoc Group